

# **EXHIBIT I**

Hector Antonio Marin Diaz

Page 205

IN THE UNITED STATES DISTRICT COURT.  
FOR THE SOUTHERN DISTRICT OF NEW YORK

IN RE: METHYL TERTIARY	)	MASTER FILE
BUTYL ETHER ("MTBE)	)	NO. 1:00-1898
PRODUCTS	)	M21-88
LIABILITY LITIGATION	)	MDL 1358 (SAS)
	)	
	)	
	)	
COMMONWEALTH OF PUERTO	)	
RICO, ET AL.	)	
PLAINTIFF,	)	CASE NO. 07-CIV-10470
	)	(SAS)
VS.	)	
	)	
SHELL OIL CO., ET AL.,	)	
DEFENDANTS.	)	

DEPOSITION OF  
CONOCOPHILLIPS COMPANY AND CHEVRON PHILLIPS CHEMICAL  
PUERTO RICO CORE, LLC THROUGH  
HECTOR ANTONIO MARIN DIAZ  
AUGUST 22, 2013  
VOLUME 2

Called as a witness by counsel for the Plaintiffs, taken before Dorothy A. Rull, Certified Realtime Reporter and Notary Public in and for the State of Texas, on the 22nd day of August, 2013, from 9:13 a.m. to 5:29 p.m., at the law offices of Norton Rose Fulbright, 1301 McKinney, Suite 5100, Houston, Texas 77010, pursuant to Notice and the Federal Rules of Civil Procedure.

Hector Antonio Marin Diaz

Page 357

1 transaction, no. I have only seen that reference  
2 there and this one.

3 Q. Okay. And the reference that you do  
4 see, are you aware of any agreement between Tauber  
5 Oil and Phillips Puerto Rico Core?

6 A. In general or what is referenced here?

7 Q. Well, let's start with here.

8 A. At least here, it doesn't reference  
9 that.

10 Q. Okay. And are you aware generally of an  
11 agreement between -- any agreement -- supply  
12 agreement between Phillips Puerto Rico Core and  
13 Tauber?

14 A. In the documents that I've reviewed, I  
15 don't have that information.

16 Q. Okay. If we could go Exhibit 12,  
17 Page 4, Response 7.

18 Between the years 1990 and 2000 --

19 A. Excuse me one second. On Exhibit 12?

20 Q. Exhibit 12, Page 4.

21 A. Page 4, Response 7.

22 Q. Okay. Between the years of 1990 and  
23 2000. Do you see that?

24 A. Correct. Yes.

Hector Antonio Marin Diaz

Page 358

1 Q. Are you aware of any transactions  
2 involving Tauber during that time period?

3 A. In that period of time, their name is  
4 not here.

5 Q. Okay. That's not -- that's a  
6 different -- that's not exactly answering my  
7 question.

8 Are you aware of any transactions  
9 between Phillips and Tauber during that time period?

10 A. Yes. I understood now.

11 No. I don't have any knowledge of  
12 that.

13 Q. Thank you.

14 MR. WALSH: Nothing further.

15 EXAMINATION

16 BY MR. DILLARD:

17 Q. Mr. Marin, I have a few questions for  
18 you, sir.

19 Yesterday you were asked questions  
20 about a gasoline made at Core referred to in  
21 documents as house brand gasoline.

22 Do you recall that?

23 A. Yes. Correct.

24 Q. Have you done additional work, as the